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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

HUAWEI TECHNOLOGIES CO., LTD., )  
 HUAWEI DEVICE USA, INC., and )  
 HUAWEI TECHNOLOGIES USA, INC., )

Plaintiff(s)/Counterclaim  
 Defendants,

vs.

SAMSUNG ELECTRONICS CO., LTD, )  
 SAMSUNG ELECTRONICS AMERICA, )  
 INC., )

Defendants / Counterclaim-  
 Plaintiffs,

and

SAMSUNG RESEARCH AMERICA, INC., )

Defendant,

v.

HISILICON TECHNOLOGIES CO., LTD., )

Counterclaim-Defendant.

Case Number: 3:16-cv-2787-WHO

**HUAWEI'S UPDATED ELECTION OF  
 ASSERTED CLAIMS AND ACCUSED  
 PRODUCTS PURSUANT TO THE  
 COURT'S CASE MANAGEMENT  
 ORDERS**

REDACTED VERSION OF DOCUMENT  
 SOUGHT TO BE SEALED.

Pursuant to the Court's Civil Pretrial Order (Dkt. 208), the parties' Joint Case Management Conference Statement of January 12, 2018 (Dkt. 224), and the Amended Scheduling Order (Dkt. 272), Plaintiffs' Huawei Technologies Co., Ltd., Huawei Device USA, Inc., Huawei Technologies USA, Inc., and HiSilicon Technologies Co. Ltd. ("Huawei") hereby narrows its currently asserted patents to 4, narrows its currently asserted patent claims to no more than 10, narrows the accused Samsung products to 23 models, and identifies representative products as set forth below.

#### Asserted Claims

- U.S. Patent 8,416,892, claims 1, 10
- U.S. Patent 8,644,239, claims 7, 18
- U.S. Patent 8,885,587, claims 3, 9
- U.S. Patent 8,724,613, claims 1, 5

#### Accused Products

In accordance with the agreed product narrowing protocol outlined in Dkt. 224, Huawei identifies the following 23 Samsung models, which fall into five groups based on the common baseband chip used by all models in each group. Based on the evidence provided by Samsung and Qualcomm in discovery, all products within each group contain the same functionality for purposes of assessing infringement of Huawei's patents. Therefore, provided that the parties enter or the Court orders a representative products stipulation, Huawei believes that focusing on 5 representative models at trial will be sufficient (one from each group), rather than presenting 15 separate models to the jury as currently contemplated by to the Court's orders and the parties' stipulation. *See* Dkt. 224. Huawei reserves the right, pursuant to the terms of any agreed or ordered representative products stipulation, to seek damages with respect to additional models that use the same baseband chips as the models listed below.

1. Group 1: [REDACTED] baseband chip
  - a. Galaxy S8 - [REDACTED]
  - b. Galaxy S8 Plus - [REDACTED]
2. Group 2: [REDACTED] baseband chip
  - a. Galaxy S7 - [REDACTED]
  - b. Galaxy S7 Edge - [REDACTED]
3. Group 3: [REDACTED] baseband chip
  - a. Galaxy S6 - [REDACTED]
  - b. Galaxy S6 Edge - [REDACTED]
  - c. Galaxy S6 Edge Plus - [REDACTED]
  - d. Galaxy Note 5 - [REDACTED]
4. Group 4: [REDACTED] baseband chip
  - a. Galaxy S5 - [REDACTED]
5. Group 5: [REDACTED] baseband chip
  - a. Galaxy S6 - [REDACTED]
  - b. Galaxy S6 Edge - [REDACTED]
  - c. Galaxy S6 Edge Plus - [REDACTED]
  - d. Galaxy Note 5 - [REDACTED]

1 Dated: June 26, 2018

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

Pursuant to Rule 5-5 of the Civil Local Rules of the United States District Court for the Northern District of California, I hereby certify under penalty of perjury under the laws of the United States of America that on June 26, 2018, a true copy of the below documents were served upon Samsung's counsel of record via the email address QE\_Huaweiv.Samsung@quinnemanuel.com.

- PLAINTIFFS' UPDATED ELECTION OF ASSERTED CLAIMS & ACCUSED PRODUCTS PURSUANT TO COURT'S CASE MANAGEMENT ORDERS

DATED: June 26, 2018

SIDLEY AUSTIN LLP

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